


APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 8/28/2023

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Defendant shall respond to Plaintiff's complaint by October 4, 2023.

August 25, 2023

VIA ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Bennett v. T & J 2006, LLC et al., Case No 1:23-cv-05400-VSB

Dear Judge Broderick:

This firm represents Defendant Starbucks Corporation ("Defendant") in the above-referenced matter. We have conferred with Plaintiff's counsel and write, with Plaintiff's consent, to request an extension of Defendant's time to move, answer, or otherwise respond to the Complaint, up to and including October 4, 2023.

By way of background, Defendant was purportedly served with the Summons and Complaint on July 3, 2023, as per counsel's affirmation of service filed with the Court on August 1, 2023, which made Defendant's response deadline July 24, 2023 (ECF No. 7). On August 4, 2023, the Court granted Defendant's first letter motion requesting an extension of its responsive pleading deadline, extending that date to September 4, 2023 (ECF No. 11).

Defendant respectfully requests that the Court extend the deadline to move, answer, or otherwise respond to the Complaint by an additional 30 days, up to and including October 4, 2023. The reason for this request is to provide Defendant with additional time to investigate the Complaint allegations, and respond accordingly, and based on availability issues over the summer months. This is the second request for an extension of Defendant's responsive pleading deadline, and the requested relief will not affect any other scheduled dates.

This application is being made in good faith and not to cause undue delay. We thank the Court for its time and attention to this matter, and for its consideration of this application.



Hon. Judge Vernon S. Broderick
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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)